



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 12 2013

REPLY TO THE ATTENTION OF:

WU-16J

CERTIFIED MAIL 7009 1680 0000 7664 0930
RETURN RECEIPT REQUESTED

Mr. Dimitrios Papas
Environmental Geo-Technologies, LLC
1216 Beaubien
Detroit, Michigan 48174

Re: Authorization to Inject into Two Class I Wells Located at the Environmental Geo-Technologies Facility in Romulus, Michigan, U. S. Environmental Protection Agency Permit Numbers: MI-163-1W-C010 and MI-163-1W-C011

Dear Mr. Papas:

The U. S. Environmental Protection Agency has completed its review of all documentation regarding the requirements to receive authorization to inject into the two Class I wells identified above. The permit conditions identified at Part I, Section L "Commencement of Injection" contained in the two Class I permits identify requirements needed to be met in order to receive EPA written approval to inject into the wells. All conditions of this section have been met and EPA authorizes injection into the two Class I wells.

A summary of EPA's findings regarding compliance with Part I, Section L "Commencement of Injection" of the permits is as follows:

1. Information to be Submitted:

Documentation submitted by Environmental Geo-Technologies (EGT) on March 1, 2013 and collected during EPA's site inspection on June 26 and 27, 2013, identified EGT personnel and their qualifications, and established that well operators on site during the operation of the injection wells have adequate training, including training on deep well operations. EGT's personnel training and staffing plan demonstrates that all operators who will be on site during the operation of the injection wells have adequate training and provides for annual continuing education for all operators. This letter serves as the EPA Director's written approval of EGT's personnel training and staffing plan.

2. Director Inspection:

EPA has inspected all well monitoring equipment and found it to be operational. During EPA's June 26 and 27, 2013 site inspection, some monitors were found to be inoperable. After notifying EGT of the inspection findings, EGT corrected the deficiencies. EPA re-inspected the operation of all well monitors on August 8, 2013 and found all monitors to be operational.

3. Mechanical Integrity Demonstration:

In accordance with the mechanical integrity requirements of the permits and federal regulations, EGT conducted a Standard Annular Pressure Test (SAPT), Radioactive Tracer Survey (RTS) and Temperature Log (TL) on both wells. EPA approved the test procedures for the SAPT, RTS, and TL in a letter to EGT dated November 28, 2012. EGT conducted the tests on December 4 and 5, 2012 and January 16, 2013. After reviewing the test results EPA found that EGT did not conduct the RTS and TL for both wells according to the EPA approved test procedures which resulted in questionable test results. In a letter from EPA to EGT dated June 5, 2013, EPA outlined the test deficiencies and required EGT to retest the wells. EPA witnessed the re-testing of the wells during a site inspection on June 26 and 27, 2013. Upon review of the new test results, EPA has found that EGT has demonstrated mechanical integrity of the two wells. EPA's reviews of the June 26 and 27, 2013 test results are enclosed.

4. Warning and Shut-off Systems:

During EPA's site inspections on June 26 and 27, and August 8, 2013, EPA witnessed the successful test of the automatic warning and shut-off system for both wells. These tests simulated well failure conditions. In documents submitted to EPA, EGT has certified that a trained operator will be on site at all times when the wells are operating to implement the system.

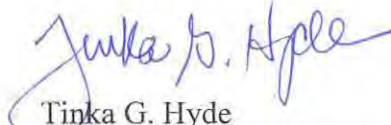
5. Notice to Inject:

EPA hereby provides written notice that the wells have been constructed in compliance with the permits, and Part III (E) of both permits has been modified to add the approved sources of waste. EPA approved the waste sources for EGT's two Class I injection wells in a letter to EGT dated June 5, 2013. The minor permit modifications were made pursuant to 40 C.F.R. §144.41. The two modified permits that reflect the approved waste sources were sent to EGT on September 5, 2013.

With this authorization, please be advised that you are now instructed to begin submitting the required monitoring reports, regardless of the well's injection status. It is EPA's understanding that EGT will not begin injection at the facility until it has received all other necessary permits and licenses from other regulatory authorities.

If you have any questions regarding this decision, please contact Allan Batka of my staff at (312) 353-7316 or e-mail at batka.allan@epa.gov.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosures

Cc: Raymond Vugrinovich, MDEQ (w/ enclosures)
De Montgomery, MDEQ
Ronda Blayer, MDEQ
Paul Schleusener, MDEQ